

**Exhibit 9**

# PAUL HASTINGS

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May 14, 2021

## VIA ELECTRONIC MAIL

Brian Rosen, Esq.  
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Eleven Times Square  
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Elizabeth L. McKeen, Esq.  
O'Melveny & Myers LLP  
610 Newport Center Drive, 17<sup>th</sup> Floor  
Newport Beach, CA 92660

Re: *In re: Commonwealth of Puerto Rico, et al.* (D. P.R. Case No. 17-3283) Discovery  
Relating to Disclosure Statement for Third Amended Title III Plan

Dear Brian and Liz:

Please find enclosed the Official Committee of Unsecured Creditors' (the "Committee") (i) second set of document requests directed to the Financial Oversight and Management Board for Puerto Rico and its advisors (collectively, the "Oversight Board"), and (ii) first set of document requests directed to the Puerto Rico Fiscal Agency and Financial Advisory Authority and its advisors (collectively, the "AAFAF"), in connection with the *Disclosure Statement for the Third Amended Joint Plan Of Adjustment Of The Commonwealth Of Puerto Rico*, Docket No. 16741, filed on May 11, 2021 (the "Third Disclosure Statement").

The requests directed to the Oversight Board (attached hereto as Exhibit A) supplement the Committee's requests dated April 23, 2021 by asking for (i) copies of all documents produced to Ambac and other parties in response to their requests, and (ii) additional documents relating to the Third Disclosure Statement the Oversight Board filed on May 11, 2021.<sup>1</sup>

The requests directed to AAFAF (attached hereto as Exhibit B), similarly, seek copies of all documents produced to Ambac and other parties and also seek documents related to particular aspects of the Third Disclosure Statement that the Committee believes may be within the custody, possession, or control of AAFAF and its advisors. To the extent the same documents are produced by the Oversight Board, the Committee does not need them from AAFAF.

For all the reasons set forth in my letter dated April 23, 2021, a copy of which is attached hereto as Exhibit C, these discovery requests are necessary to permit unsecured creditors to fully evaluate the Third Disclosure Statement and for the Committee to make a recommendation to its constituents. Brian, in your letter of today's date, you state that the Committee's requests are inappropriate because the Committee "propounded its requests without providing any

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<sup>1</sup> The Committee does not believe it is necessary to re-serve its April 23 requests in light of the filing of the Third Disclosure Statement. All references in the April 23 requests to the *Disclosure Statement for the Second Amended Plan of Adjustment* should be construed as references to the Third Disclosure Statement.

**PAUL**  
**HASTINGS**

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explanation why it believes any particular disclosures are inadequate.” Your assertion that the Committee must identify inadequacies in the disclosure statement **before** serving discovery is incorrect. The Committee needs this discovery, in part, to identify additional relevant information that has not been, but should be, included in the Disclosure Statement. Moreover, the Committee has no obligation to explain the basis for each of its discovery requests prior to receiving the Oversight Board’s responses and objections.

Given that objections to the Third Disclosure Statement are due on June 15, 2021, and to ensure coordination with other parties in interest, the Committee requests that any formal responses and objections to these requests be served by May 21, 2021, which is the same date the Oversight Board has agreed to respond to the Committee’s initial discovery requests and the discovery requests Ambac served on May 12, 2021.

We request that the Oversight Board and AAFAF meet and confer with us on May 24, 2021. Please let me know if you are available.

Please contact me if you have any questions.

Sincerely,



Nicholas A. Bassett  
of PAUL HASTINGS LLP

Encl.